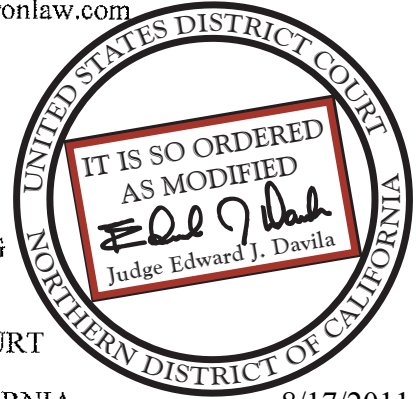


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Attorneys for Plaintiff
 PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG



UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

8/17/2011

PROBUILDERS SPECIALTY INSURANCE)
 COMPANY, RRG, a District of Columbia, Risk)
 Retention Group,

Plaintiff,

v.

VALLEY CORP. B., a California Corporation)
 formerly known as R.J. HAAS CORP.;)
 RONALD J. HAAS, an individual; TY LEVINE,)
 an individual; KAREN LEVINE, an individual;)
 SACHI ADACHI, an individual; TATSUKO)
 ADACHI, an individual; and R.J. HAAS)
 CONSTRUCTION CORP., a California)
 Corporation,

Defendants.

CASE NO.:5:10-cv-05533-EJD

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING EXPERT
 DISCOVERY-RELATED DEADLINES**

Plaintiff PROBUILDERS SPECIALTY INSURANCE COMPANY ("ProBuilders"),
 Defendant/Counter-Claimants Ronald J. Haas ("Haas"), and Ty and Karen Levine ("Levines")
 (collectively "Parties"), by and through their respective attorneys of record, hereby stipulate as
 follows:

1. On March 9, 2011, the Court issued a Scheduling Order. Pursuant to the Court's
 Scheduling Order, the following deadlines are currently set:

Expert Disclosure	September 16, 2011
Rebuttal Expert Disclosure	September 30, 2011

1 Last Day for Hearing on
Objection to Expert Disclosure November 11, 2011

2 Close of Discovery November 18, 2011

3 2. The Parties have worked together in conducting discovery in this matter. However,
4 due to the large amount of documents, full disclosure of documents in this matter has not been
5 completed. Once these documents have been produced, the parties will need time to review these
6 documents, and conduct further discovery, including depositions, as necessary, prior to completing
7 its expert disclosures.

8 3. The Levines have recently filed a Counterclaim against ProBuilders alleging bad
9 faith. ProBuilders will need time to conduct discovery regarding the Levines' Counterclaim alleging
10 bad faith prior to producing its expert disclosure.

11 4. The Parties agree that the expert disclosure and rebuttal expert disclosure deadlines
12 should be extended 30 days in order to allow the Parties more time to conduct discovery prior to the
13 expert disclosure and rebuttal expert disclosure deadlines.

14 5. Therefore, the Parties hereby stipulate and agree to the following discovery
15 deadlines:

16 Expert Disclosure October 16, 2011

17 Rebuttal Expert Disclosure October 30, 2011

18 Last Day for Hearing on
19 Objection to Expert Disclosure December 12, 2011¹

20 6. The close of discovery shall remain November 18, 2011.

21 7. The Parties hereto believe that in the interests of judicial economy and the interests
22 of justice will be bet served by the requested extension of discovery deadlines.

23 8. This Stipulation will not alter the date of any other event or any other deadline already
24 fixed by Court Order.

25 ///

26 _____
27 ^{1/}This deadline is 43 days after the deadline for Rebuttal Expert Disclosures. A 42 day deadline
28 (pursuant to the March 9, 2011 Scheduling Order) would require the Motion to be heard on
December 5, 2011, and noticed on October 31, 2011, one day after the deadline for Rebuttal Expert
Disclosures.

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Dated: August 16, 2011

YARON & ASSOCIATES

[Signature] [Signature]

JAMES I. SILVERSTEIN, ESQ.
HIELAM CHAN, ESQ.
Attorneys for Plaintiff/Counter-Defendant
PROBUILDERS SPECIALTY INSURANCE
COMPANY

HINES SMITH CARDER DINCEL BLAND

Dated: _____

KIM DINCEL, ESQ.
JULIE ROGERS, ESQ.
Attorneys for Defendant/Counter-Claimant
TY LEVINE AND KAREN LEVINE

GREENAN, PEPPER, SALLANDER &
LALLY, LLP

Dated: August 12, 2011

Chip Cox

CHIP COX, ESQ.
Attorney for Defendant/Counter-Claimant
RONALD J. HAAS

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: _____

UNITED STATES DISTRICT JUDGE
EDWARD J. DAVILA

YARON & ASSOCIATES

Dated: _____

JAMES I. SILVERSTEIN, ESQ.
HIELAM CHAN, ESQ.
Attorneys for Plaintiff/Counter-Defendant
PROBUILDERS SPECIALTY INSURANCE
COMPANY

HINES SMITH CARDER DINCEL BLAND

Dated: 8-18-11



KIM DINCEL, ESQ.
JULIE ROGERS, ESQ.
Attorneys for Defendant/Counter-Claimant
TY LEVINE AND KAREN LEVINE

GREENAN, PEFFER, SALLANDER &
LALLY, LLP

Dated: _____

CHIP COX, ESQ.
Attorney for Defendant/Counter-Claimant
RONALD J. HAAS

PURSUANT TO THE STIPULATION, IT IS SO ORDERED AS MODIFIED:

The Court includes the following deadlines to the parties' proposed scheduling deadlines:

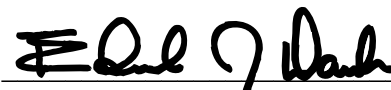
Last Date for Hearing Dispositive Motions on or before **February 10, 2012 at 9:00 a.m.**

Preliminary Pretrial Conference on **November 4, 2011 at 11:00 a.m.**

Joint Pretrial Conference statement due **October 25, 2011.**

Deadline to file referral to Court's ADR program on or before **August 31, 2011.**

Dated: August 17, 2011



Edward J. Davila
United States District Judge

CERTIFICATE OF SERVICE

I am over 18 years of age and not a party to the within action. I am employed in the County of San Francisco; my business address is **Yaron & Associates, 601 California Street, Suite 2100, San Francisco, California 94108.**

On **August 16, 2011**, I served the within:

**STIPULATION AND [PROPOSED] ORDER EXTENDING EXPERT
DISCOVERY-RELATED DEADLINES**


**DECLARATION OF JAMES I. SILVERSTEIN IN SUPPORT OF STIPULATION
AND [PROPOSED] ORDER EXTENDING EXPERT DISCOVERY-RELATED
DEADLINES**

on all parties in this action, as addressed below, by causing a true copy thereof to be distributed as follows:

TO ALL PARTIES ON THE ECF SERVICE LIST

*** VIA ELECTRONIC SERVICE:** I served a true copy, with all exhibits, electronically on designated recipients through PACER. Upon completion of electronic transmission of said document(s), a receipt is issued to serving party acknowledging receipt by PACER's system. Once PACER has served all designated recipients, proof of electronic service is returned to the filing party which will be maintained with the original document(s) in our office. This service complies with CCP §101.6.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on **August 16, 2011**, at San Francisco, California.


LYDIA BURTON
lbarton@yaronlaw.com